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January 2, 2020

VIA ECF

Hon. Paul A. Crotty, United States District Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse

Re: *Zarate et al v. New Green Emporium Corp. et al*, 17 CV 670 (PAC)

Dear Judge Crotty:

This firm represents the plaintiff in the above-referenced action. The plaintiff moves for an extension of time to complete discovery from January 31, 2020, until April 30, 2020, and for an adjournment of the January 8, 2020, conference. This request for an extension of the discovery deadline is the plaintiff's second, and the previous request was granted. The defendants Hyoun Ah Kim, Hyon Chon Song, and New Green Emporium Corp. consent to this letter. The defendant Jun Kyu Kim is unrepresented at this time, and the plaintiff has not been in contact with him.

The defendant Hyon Chon Song has been deposed and defendant Hyon Chon Song and New Green Emporium Corp. have deposed the plaintiff. These same parties have served and responded to each other's requests for production of documents and interrogatories.

As explained in plaintiff's September 24, 2019, letter, in defendant Hyon Chon Song's deposition, and according to documents provided by Hyon Chon Song, a corporation, 488 Corp., and a man named Jun Kyu Kim owned the defendants' business until approximately December 2015. In addition, the defendant Hyon Chon Song provided information regarding the subsequent and current owner of defendants' business, New Green Emporium.

On November 6, 2019, the plaintiff amended the complaint on consent, adding Jun Kyu Kim, the prior owner, and Hyoun Ah Kim, the current owner. Jun Kyu Kim was served on December 13, 2019, and the answer is due January 3, 2020. See ECF No. 41. If defendant Jun Kyu Kim does not answer the first amended complaint, plaintiff will request a clerk's certificate of default.

Hyoun Ah Kim was served December 12, 2019, and the answer is due today. See ECF No. 40. Hyoun Ah Kim is currently represented by Ahne & Ji, LLP. See ECF No. 43. Upon consent and stipulation, Hyoun Ah Kim, by their attorneys, will be moving this Court for an extension of time to answer the first amended complaint from January 2, 2020, until January 16, 2020.

The defendant Hyon Chon Song answered the first amended complaint on January 2, 2020, and has made crossclaims against defendant Jun Kyu Kim.